

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

FILED

U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA

## UNITED STATES DISTRICT COURT

2023 JAN -3 PM 12:05

for the

District of

Nebraska OFFICE OF THE CLERK

Division

Jallah K Bolay

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Case No. 8:23 CV 1  
(to be filled in by the Clerk's Office)Jury Trial: (check one)  Yes  No

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CLERK  
U.S. DISTRICT COURTConcordia University, Nebraska

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Jallah K Bolay  
407 Fletcher Ave, Apt 8  
Lincoln, Lancaster County  
Nebraska 68508  
785-462-5321  
jallah.bolay@cunl.org

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name \_\_\_\_\_  
Job or Title (*if known*) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (*if known*) \_\_\_\_\_

Concordia University Nebraska

800 N Columbia Ave  
Seward, Seward County  
Nebraska, 68434  
402-643-3651  
bernard.bull@cone.edu

## Defendant No. 2

Name \_\_\_\_\_  
Job or Title (*if known*) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (*if known*) \_\_\_\_\_

\_\_\_\_\_

## Defendant No. 3

Name \_\_\_\_\_  
Job or Title (*if known*) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (*if known*) \_\_\_\_\_

\_\_\_\_\_

## Defendant No. 4

Name \_\_\_\_\_  
Job or Title (*if known*) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (*if known*) \_\_\_\_\_

\_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question  Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

18 U.S. Code § 1513 - Retaliating against a victim (Complainant)  
 18 U.S. Code § 242 - Deprivation of rights under color of law  
 18 U.S. Code § 12203 - Prohibition against retaliation and coercion

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, (name) Talib K Bolay, is a citizen of the State of (name) Nebraska.

##### b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_ and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

#### 2. The Defendant(s)

##### a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) Concordia University Nebraska, is incorporated under the laws of the State of (name) Nebraska, and has its principal place of business in the State of (name) Nebraska.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

*See attached page for II 3*

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

*See attached for III*

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

*In light of the aforementioned, I am hereby seeking  
due-process in accordance with the law. And next, I am  
open to further resolution and relief as fitting.*

II 3

⇒ The retaliatory action and failure by Concordia University Nebraska to enroll me into my MBA course negatively impacted a \$15,000-plus student loan opportunity; and that significantly contributed to a financial distress situation that led me out of my apartment (residence) and also created a living hardship for me.

⇒ The retaliatory action and failure by Concordia University Nebraska to negatively impacted my MBA education and created a 12 months set back.

III

Plaintiff Bolay was enrolled in an MBA-508, Innovation & Business Model Generation course at Concordia University Nebraska in the Spring of 2022.

At the end of the course, Plaintiff Bolay contacted his course professor who was also the MBA program Director (in good faith) regarding his grade discrepancy and to share the unusual bully attempts by a few new class members during instructional hours; and at times with the course professor even aiding and abetting bully attempts and action directed at Plaintiff Bolay. Unfortunately the MBA-508 Professor deliberately chose to NOT address and resolve Plaintiff Bolay's MBA-508 course concern issues. So plaintiff Bolay contacted the ~~Concordia~~ defendant

Next page

Concordia Nebraska to report his 2022 spring MBA grade discrepancy, and bully attempts/actions and the unproductive learning experience he had during the Spring 2022 semester.

At the end of the day and, instead, plaintiff Bolay's MBA program at Concordia University Nebraska was disrupted.

Defendant Concordia Nebraska failed to fairly resolve plaintiff Bolay's course grade discrepancy, and the bullying ~~ever~~ attempts and actions.

And the overall unproductive learning experience plaintiff Bolay had during the spring 2022 Semester. Even worse,

Defendant Concordia University Nebraska retaliated against plaintiff Bolay by not allowing him to continue his MBA program ~~with~~ up to date. And just less than 6 courses to graduation.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Dec 17, 2022

Signature of Plaintiff

Printed Name of Plaintiff

Jallah Bolay  
Jallah K Bolay

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

United States District Court of Nebraska  
111 South 18th Plaza, Suite 1152  
Omaha NE, 68102

OMAHA NE 68102

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CLERK  
U.S. DISTRICT COURT

Return: Jallah Bolay

~~1101 1/2~~ 940 Moffit Ave  
Omaha NE 68134

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